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OCT 05 2001

**SALT RIVER PROJECT**

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WILLIAM P. SCHRADER, PRESIDENT
JOHN M. WILLIAMS, Jr., VICE PRESIDENT
RICHARD H. SILVERMAN, GENERAL MANAGER

October 1, 2001

Ms Carol Hanlon
S&ER Products Manager
U.S. Department of Energy
Yucca Mountain Site Characterization Office
P.O. Box 30307 M/S 025
North Las Vegas, NV 89036-0707

***RE: Public Comment on Yucca Mountain Preliminary Site Suitability
Evaluation (PSSE)***

Dear Ms. Hanlon:

Salt River Project (SRP) welcomes the opportunity to comment on the PSSE and its associated scientific documents including the Yucca Mountain Science and Engineering Report, Supplement to the Draft Environmental Impact Statement, Preliminary Pre-Closure and Post-Closure Suitability Evaluations, and Total System Performance Assessment for the Site Recommendation.

As one of the country's first Federal Reclamation Projects, SRP has served as steward for the safe use of water and power for Central and Eastern Arizona for nearly 100 years. It understands the importance of protecting surface and groundwater resources as well as providing a safe, reliable, and economic supply of electricity utilizing diverse resources – one of which is commercial nuclear power.

The PSSE and related documents and studies address all of the issues associated with the safe deep geologic storage of used nuclear fuel from commercial nuclear reactors along with other high level radwaste products from both the commercial and military nuclear programs.

It is clear from the PSSE that Yucca Mountain can serve as a safe, long-term repository of high-level radioactive products. The potential for damage to surface or groundwater

is essentially non-existent. The apparent risks of relatively short-term storage at numerous temporary sites across the country is likely to be much more significant, not only for our nation's groundwater, but also for our populace. For this reason, SRP would strongly encourage the Secretary to proceed with a recommendation to the President that the Yucca Mountain site be utilized for the Nation's high level used fuel and radwaste repository at the earliest possible time.


SRP believes there are no legitimate, scientifically based reasons for the President not to conclude that the Yucca Mountain site is qualified for the preparation and submission of a construction license application to the Nuclear Regulatory Commission.

As providers of electricity to much of Central and Eastern Arizona, SRP relies on nuclear power from the Palo Verde Nuclear Generation Station (PVNGS) as one of its diverse sources of electricity. It is critical for the commercial nuclear power industry to have DOE fulfill its commitment to take possession of used nuclear fuel and properly store or emplace it in a suitable repository. Yucca Mountain should be that repository.

However, as one of the youngest commercial nuclear facilities in our country, it is not clear that used PVNGS fuel will ever be placed at Yucca Mountain, given the 77,000-ton limit currently included in the study documents. SRP and the other owners of PVNGS have paid their share of the study and development costs for the Yucca Mountain site. Unless the artificially established 77,000-ton limit is adjusted to actually match the physical capacity of the repository site, PVNGS and other existing, young plants will not receive an appropriate benefit for the fees they have paid.

SRP encourages the Secretary to recommend to the President approval of the Yucca Mountain site and to recommend that its capacity be expanded to match the physical limits of the site to allow all existing commercial nuclear plants to benefit from the extensive study that this site has undergone over the years.

Sincerely,


William P. Schrader